> [I]f the abnormality of the actuator 4 continues to be detected by the abnormality detecting unit 203 of the main CPU 201 (S110), the main CPU 201 determines that the abnormality is not being caused by the runaway of the sub-CPU 431, in which case the power supply control circuit 205 is made to continue cutting off the power supply to the power-on resetting circuit 437 (S111), whereby the sub-CPU 431 is activated in no case, and the optical axis direction changing operation by the actuator 4 is stopped.
>
> * * *
>
> Note that also in the case of the second abnormality, if the main CPU 201 continues to detect the abnormality of the actuator 4 despite of the fact that the sub-CPU 431 has been reset (S110), as with the case of the first abnormality, the power supply control circuit 205 is caused to continue cutting off the power supply to the power-on resetting circuit 437 (S111) so that the sub-CPU 431 is not activated, and a fail safe is then executed (S112).

(Page 23, lines 10-18 and page 25, lines 1-9; *see also* FIG. 10, S108, S111)

Applicant reiterates its arguments from the previous reply that there would have been no motivation to combine the references. However, even if there were such a suggestion, that would not result in the claimed subject matter.

In particular, according to the Sato et al. patent, each time the main unit detects a runaway condition of a subunit, power to the subunit is shut off "so that the resetting means in the subunit resets the microcomputer" in the subunit (col. 2, lines 9-12; *see also* col. 3, lines 45-64). The system of the Sato et al. patent appears capable of repeatedly detecting a runaway condition, shutting off power to the subunit, and then resetting the subunit's microcomputer. However, each time runaway of the subunit is detected, the subunit's microcomputer is reset, and the power supply to the subunit is turned on (*see* FIG. 4).

The example discussed in the Sato et al. patent makes that clear. In particular, a CPU 1 may detect that a CPU 2 in the subunit has runaway (col. 3, lines 35-44). As shown in FIG. 4, as

part of the rest process, there is a POWER-OFF INTERVAL for CPU 1. The power source V_{cc} of the CPU 2 in the subunit gradually drops (col. 3, lines 56-57; FIG. 4), and subsequently rises at time t_{ri} (col. 3, lines 29-30; FIG. 4). Thus, according to the Sato et al. patent, power to the CPU 2 in the subunit is reset *each time* runaway occurs. The Sato et al. patent does not disclose or suggest *continuing to maintain the power supply cut off state* when the main control circuit repeatedly detects an abnormality in the sub-control circuit after the power supply control means has been activated. Instead, the power cut off state is temporary and is not maintained because the power is reset each time. Indeed, even the Office action agrees that the power supply is only "temporarily" cut off (*see* page 7, last sentence),.

Therefore, according to the Sato et al. patent, even when a runaway condition repeatedly is detected, the power cut off state is not "maintained." Instead, the operation illustrated by FIG. 4 will occur so that the subunit's microcomputer is reset and V_{cc} power of the CPU 2 in the subunit is turned on.

At least for the foregoing reasons, the pending claims should be allowed.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 12/20/05

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